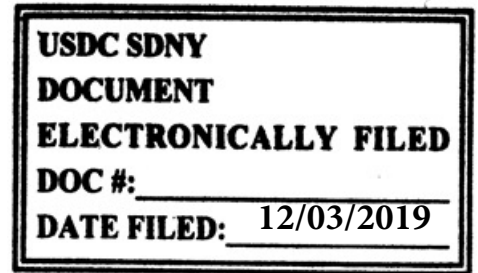


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December 2, 2019

VIA ECF

Hon. Katharine H. Parker
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

**RE: *Lynette Tatum-Rios v. Calligaris USA Inc.*, No. 1:19-cv-05501-LTS-KHP
Request for Extension of Time to Answer and to Adjourn Initial Conference**

Dear Judge Parker:

I represent Defendant Calligaris USA Inc. ("Calligaris") in the above-referenced case. I write to seek an additional extension of the Answer deadline on behalf of Calligaris.

The Complaint in this case was filed on June 12, 2019. (Doc. No. 1). Calligaris was served on October 24, 2019, making its Answer due on November 14, 2019. (Doc. No. 21).

On November 11, 2019, Calligaris requested an extension of time to respond to the Complaint to December 5, 2019. The Court granted that request on November 12, 2019. (Doc. No. 25).

The parties are currently discussing resolution of the case and believe they will be able to resolve it amicably. In order to keep attorney's fees for both sides to a minimum, Calligaris therefore requests that the Court extend its time to respond to the Complaint, including any response contemplated by Fed. R. Civ. P. 12, to January 3, 2019.

For the same reasons, the parties respectfully request that the Court adjourn the Initial Case Management Conference currently scheduled for December 16, 2019 and reschedule it for a date on or after January 6, 2019.

This is Calligaris' second request to extend the Answer deadline and its first to adjourn the Initial Case Management Conference. Both requests are made with the consent of Plaintiff's counsel.

Respectfully submitted,

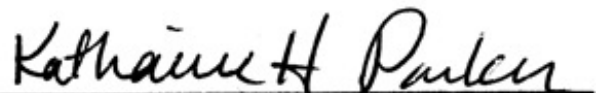


Edward P. Abbot, Esq.
HAWKINS PARNELL & YOUNG, LLP

cc: Christopher Howard Lowe, Esq. (via ECF)

APPLICATION GRANTED: The Defendnat's deadline to respond to the complaint is extended to January 3, 2020. The Initial Case Management Conference in this matter that is scheduled for Monday, December 16, 2019 at 10:00 a.m. in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to Tuesday, January 21, 2020 at 10:45 a.m.

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

12/03/2019